

Tab 1 Appendix G

Reporting For EPCRA

1. Purpose. This tab outlines policy, establishes responsibilities, and provides operating guidance to for hazardous material inventory reporting, munitions expenditure reporting, and transient aircraft/vehicle refueling reporting to comply with the Emergency Planning and Community Right-To-Know Act (EPCRA) of 1986.

2. General. Hazardous Material Inventory & Munitions Expenditure Reports are used to support installation compliance with EPCRA, Executive Order 13148, and Section 112(r) Clean Air Amendments. Hazardous Material Inventory & Munitions Expenditure Reports are due to the ENRD Hazardous Materials Manager quarterly, covering the entire calendar year. Reports are prepared in accordance with this Tab of Appendix G and supplemental memorandums published quarterly.

3. Installation procedures.

a. EPCRA requires specific reporting requirements. Such requirements include two reports, which are forwarded to the Commonwealth of Virginia, Local Emergency Planning Committees, and the Environmental Protection Agency. These two reports consist of the Tier Two report (Emergency Response Information) and the Form R report (Toxic Release Inventory). The Tier Two report provides information to emergency planners and responders in the event of a chemical accident. It is submitted to the State of Virginia and Local Emergency Planning Committees by March 1st of each year. The Form R report provides information concerning releases of hazardous materials as a result of use of certain toxic chemicals. Such information includes quantities and types of pollutants released into media (air, land and water) and transferred off site as waste. The Form R report is due by July 1st of each year. Both reports become public record. Hazardous material inventory data is used to meet these requirements.

b. The ENRD Hazardous Materials Manager is responsible for completion and submission of the Tier Two and Form R reports for both Fort Eustis and Fort Story to include all data collection, compiling, and calculations.

c. Both reports are signed by the Garrison Commander before submission to the correct organizations mentioned above.

4. Hazmart procedures.

a. The Hazmart database administrator is required to submit quarterly electronic files of all Hazmart transactions for Fort Eustis through the FE Hazmart and of all Fort Story transactions through the Little Creek Hazmart. This data will include, but is not limited to, the National Stock Number (NSN), Product ID/Name, Manufacturer, MSDS #, Unit of Issue, Quantity of Issue, Name of Purchasing Unit, Location of Purchasing Unit, and POC from Purchasing Unit for each transaction.

5. Unit/activity procedures.

a. Hazardous Material Inventory Reporting.

(1) This requirement pertains to all tenant activities at Fort Eustis and Fort Story.

(2) All tenant activities are required to obtain all hazardous materials from the Hazmart. This requirement is delineated in this regulation in Appendix G, *Hazardous Material Management*.

(3) All tenant activities are required to submit Hazardous Material Inventory Reports that consist of a memorandum and a compressed gas cylinder inventory (see figures 1-3, below). This memorandum should include of a list of hazardous material storage and use locations. Examples of storage and use locations include building numbers or vessel numbers. An example of the memorandum is found at figure 1. **The compressed gas cylinder**

inventory is only required if an activity has obtained compressed gases from sources other than the Hazmart.

Instructions for completing the compressed gas cylinder inventory are provided in figure 3 below. Additionally, any other hazardous material (and quantities on hand) obtained from sources other than the Hazmart must be listed on the memorandum. Copies of material safety data sheets for these materials must be attached. Memorandums must be signed by the proper chain of command (examples of individuals with signatory authority include battalion commanders, division chiefs, and directors).

(4) Information on compressed gases obtained from sources other than the Hazmart must be provided. The information required is noted in the memorandum at figure 1 and the Compressed Gas Inventory Form at figure 2. Instructions for completing the form are provided at figure 3. Known or estimated quantities of compressed gases must be provided in “cubic feet” units. Compressed gases obtained from the Hazmart do NOT need to be reported. Examples of compressed gases include gases (gaseous phase and liquefied phase) contained in cylinders such as argon, acetylene, oxygen, liquefied oxygen, propane, helium, carbon dioxide, nitrogen, hydrogen and chlorine.

b. Munitions Expenditure Reporting. Directorate of Plans, Training, Mobilization & Security (DPTMSEC), Aviation Applied Technology Directorate (AATD), Explosive Ordnance Disposal Training & Evaluation Unit Two (EOD TEU TWO), and Fort Story Operations. These installation tenants and activities are requested to provide a Munitions Expenditure Report in addition to the Hazardous Materials Inventory Report. The Munitions Expenditure Report should include the following information for all military munitions expended, fired, detonated, exploded or otherwise used on ranges and training areas at Fort Eustis and Fort Story in the time period specified in the supplemental memorandum published quarterly: proper nomenclature, National Stock Number, DODIC, installation on which munitions were expended (Fort Eustis or Fort Story), and number of munitions expended. Military munitions include all types of munitions utilized for military purposes. Examples include but not limited to ammunition for individual and collective weapon systems, blank rounds, pyrotechnics, smoke grenades, CS grenades, CS capsules, demolitions devices, and others. Do not include munitions that remain in storage and have not been expended, fired, detonated, exploded or otherwise used. The Munitions Expenditure Report does not require any special format as long as the above information is provided for each munition.

c. Transient Aircraft/Vehicle Refueling Reporting. Aviation Division, DPTMSEC. Provide the total quantity of fuel used to refuel transient aircraft in the report time period specified in the supplemental memorandum published quarterly. Transient aircraft is defined as aircraft that do not have any mission or training at Fort Eustis but stop here only to refuel.

6. Contractors and vendors. Contractors and vendors who transport, handle, store and use hazardous materials on Fort Eustis and/or Fort Story must complete an initial Hazardous Material Inventory, submit it to the ENRD Hazardous Materials Manager, and then submit updates on a quarterly basis.

OFFICE SYMBOL

Date

MEMORANDUM FOR Director of Public Works, ATTN: ATZF-PWE (Taylor)

SUBJECT: Quarterly Hazardous Material Inventory Report

1. This report is submitted for 1st Quarter, CY 2002.
2. Hazardous materials for this activity/tenant are stored at the following locations:
3. The following information is required for compressed gases obtained from sources other than the Hazmart:

<u>Org.</u>	<u>User</u>	<u>POC</u>	<u>Phone #</u>	<u>Color</u>	<u>Capacity (ft3)</u>	<u>Type of Gas</u>	<u>Owner</u>	<u>Bldg No</u>
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If the tenant activity does not use any compressed gases or if the Hazmart provides all compressed gas needs then a Compressed Gas Inventory is NOT required. In this case provide one of the following statements

a. "No compressed gases are stored or used by this organization during this reporting period.", if no compressed gases are maintained by the organization.

Or

b. "All compressed gases are provided by the Fort Eustis Hazmart."

4. The following hazardous materials were obtained from sources other than the Hazmart (if applicable):

<u>Trade Name</u>	<u>Quantity</u>	<u>Source</u>	<u>MSDS Attached</u>
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5. Point of contact is _____/phone number:_____.

AUTHORIZED SIGNATURE BLOCK

Figure 1

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Instructions for Completing the Compressed Gas Cylinder Inventory

Complete this inventory as a component of the quarterly Hazardous Material Inventory Report ONLY if your organization procures its compressed gases from sources other than the Hazmart.

1. General. The U.S. Army Transportation Center is subject to the Emergency Planning and Community Right To Know Act (EPCRA) and the Clean Air Act Amendments (CAAA) of 1990. Both are federal laws with subsequent regulations requiring an inventory of all hazardous materials to include compressed gases. Compressed gases are those hazardous materials maintained in cylinders under pressure and obtained from sources other than the Hazmart. Such hazardous materials typically include oxygen, acetylene, carbon dioxide, helium, argon, chlorine, hydrogen and nitrogen. In some cases the gas may actually be in a liquefied state.

2. Instructions. Provide the requested information for EACH cylinder used by the tenant/activity that has been procured from sources other than the Hazmart. Most of the requested data can be easily derived from markings on the cylinder or by contacting the supplier.

a. SERIAL NO. Leave blank.

b. ORG. Enter the name of the organization that uses the cylinder.

c. POC. Enter the organization's point of contact for management responsibility for the cylinder.

d. PH#. Enter the phone number of the organization's point of contact.

e. CLR. Enter the color of the cylinder. The color of the cylinder depends on its contents.

f. CAP (ft3). Enter the capacity of the cylinder. This must be reported in cubic feet (ft3). This information can be obtained from the cylinder or by contacting the supplier of cylinder. In some cases this may be stamped or engraved on the cylinder. Do not use "pounds per square inch" or "PSI".

g. TYPE GAS. Note the type gas in the cylinder. This includes oxygen, acetylene, carbon dioxide, helium, argon, hydrogen, chlorine and nitrogen, and possibly other gases. Hazardous materials contained in cylinders obtained from the Hazmart/Little Creek Haz Min Center do not need to be included here. Additionally, cylinders containing compressed air such as those used for diving do not need to be included.

h. OWNER. Provide the name of the supplier of the cylinder. This normally pertains to cylinders owned by the supplier of the gas.

i. PH#. Enter the phone number of the owner/supplier of the cylinder.

j. STATUS. Leave blank.

k. BLDG#. Enter the number of the building where the cylinder is stored or used.

l. HYDRO TEST. Leave blank.

Figure 3

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